

# United States District Court

 **EASTERN**

**DISTRICT OF**

**MICHIGAN** 

UNITED STATES OF AMERICA

**V.**

AMBER HOLMAN,

ANDREW SLATER

## CRIMINAL COMPLAINT

Case:2:10-mj-30508

Judge: Unassigned,

Filed: 12-02-2010 At 03:01 PM

RE: AMBER HOLMAN & ANDREW SLATER (E  
OB)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 28 and 29, 2010, in the county of Wayne, in the Eastern District of Michigan defendant(s) Amber Holman and Andrew Slater did with intent to defraud, pass counterfeit obligations of the United States, to wit: bleached genuine \$5 Federal Reserve Notes were reprinted into counterfeit \$100 Federal Reserve Notes, in violation of Title 18 U.S.C. 472.

I further state that I am a Special Agent and that this complaint is based on the following facts:

(SEE ATTACHED AFFIDAVIT)

Continued on the attached sheet and made a part hereof:

☒ Yes

☐ No

\_\_\_\_\_  
Signature of Complainant

Timitre Kyriakides, Special Agent

United States Secret Service

Department of Homeland Security

Sworn to before me and subscribed in my presence,

December 2, 2010

Date

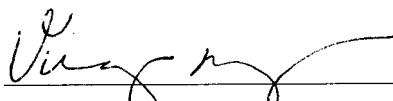
at

Detroit, Michigan

City and State

United States Magistrate Judge Virginia Morgan

United States Magistrate Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

## AFFIDAVIT

I, Timitre Kyriakides, being duly sworn, hereby depose and say:

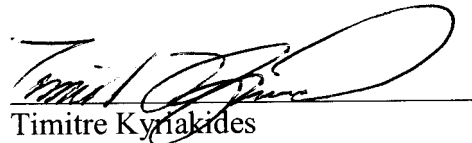
1. I am a Special Agent with the United States Secret Service assigned to the Detroit Field Office. I have been a Special Agent since January, 2009. I have received training in general law enforcement and criminal investigations at the Federal Law Enforcement Training Center, and at the United States Secret Service Rowley Training Center to include violations of Title 18, Sections 472 of the United States Code. I have conducted numerous criminal investigations and more specifically, I have been trained in the methods and traits commonly associated in the creation of counterfeit securities.
2. This affidavit is based upon information Affiant has gained from my investigation, my training and experience and from information provided by law enforcement officers and others who have personal knowledge of the events and circumstances described herein.
3. This affidavit is in support of a complaint and arrest warrant for Amber Janae Holman and Andrew Michael Slater, and is for the limited purpose of establishing probable cause. This affidavit therefore does not necessarily include all the information collected during the investigation.
4. On 09/10/10, the Detroit Field Office received (44) counterfeit \$100 Federal Reserve Notes from Bank of America, located at 40909 Ann Arbor Road, Plymouth, MI. The notes were deposited on 08/31/10 on behalf of CVS Pharmacy #8077, located at 40900 Ann Arbor Road, Plymouth, MI (hereinafter "CVS").
5. This affiant examined the notes and positively identified them as counterfeit. The counterfeit notes used in this case are classified as "bleached notes." These notes use

genuine \$5 Federal Reserve Notes with the genuine ink removed and counterfeit denominations reprinted on the genuine paper using an inkjet printer.

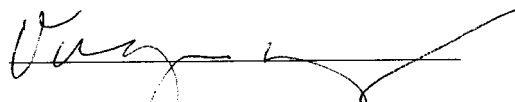
6. Affiant traveled to the CVS and met with Regional Loss Prevention Manager (RLPM) John Zeisloft. RLPM Zeisloft informed this affiant two MoneyGram transactions were the source of the counterfeit. RLPM Zeisloft provided this affiant with video surveillance, still photographs, and receipts from both MoneyGram transactions. The surveillance video from 08/28/10 shows a black female, later identified as Amber Holman, purchasing a \$2,000 MoneyGram. Holman tendered \$2,200 in counterfeit US Currency and received \$45 in change. The video surveillance from 08/29/10 shows a white male, later identified as Andrew Slater, purchasing a \$1,600 MoneyGram. Slater tendered \$1,800 in counterfeit US Currency and received \$60 change.
7. Information obtained from MoneyGram International transaction reference number 84042273 indicates that on 08/28/10, \$2,000 was sent by Tiffany Holman of Detroit from CVS # 8077, to Wal-Mart # 3476 in Canton, Michigan. The MoneyGram was received by Jessica Davis, also of Detroit.
8. Information obtained from MoneyGram International transaction reference number 83116344 indicates that on 08/29/10, \$1,600 was sent by Andrew Slater of Plymouth, Michigan, from CVS #8077 to Wal-Mart# 3476 in Canton, Michigan. The MoneyGram was received by LaPorchia Offley of St. Clair Shores, Michigan.
9. Affiant met with Loss Prevention Officer (LPO) Oli Cassim of Wal-Mart# 3476. LPO Cassim provided video surveillance footage of both transactions along with copies of the MoneyGram receipts. On 08/28/10, the video surveillance shows a black female, identified as Jessica Davis, receiving a \$2,000 MoneyGram. The receipt for the MoneyGram contained

Davis' name and address as well as the name of the sender, Holman, and her phone number. On 08/29/10, the video surveillance shows a black female, identified as LaPorchia Offley, receiving a \$1,600 MoneyGram. The receipt for the MoneyGram contained Offley's name and address as well as the name of the sender, Slater, and his phone number. In both surveillance videos, an unidentified black male is seen arriving, accompanying and leaving with the female suspects.

10. Based on the above information, this affiant has probable cause to believe that Amber Holman and Andrew Slater did, with intent to defraud, pass counterfeit obligations of the United States in violation of Title 18, Section 472 of the United States Code.

  
Timitre Kynakides  
Affiant

Subscribed and sworn before me this 2nd day of December, 2010.

  
United States Magistrate Judge Virginia Morgan